ensure that the address is entered in the exact format present in the RBOC's systems. Even slight differences, such as entering 19th Street instead of 19th St. can result in rejection of an order.

56. For the reasons explained above, use of LENS to validate an address is simply too time consuming at the pre-order stage. However, BellSouth could, but will not, provide a far superior solution than LENS at little cost to itself. Information on customer street addresses is not particularly time sensitive. BellSouth could provide downloads of the Regional Street Address Guide (RSAG) on a regular basis on magnetic tape or CD Rom or through an electronic download; indeed it is contractually obligated to do so. (Letter from Walter Schmidt, Aug. 18, 1997, att. 8). Downloads of the RSAG would allow MCI to electronically enter the information into its own system to be available to customer service representatives. That way MCI representatives would not have to use the Bell system and then re-enter the data manually into the MCI system. They could simply use the MCI system to validate addresses and thus substantially reduce the risk of rejected orders. BellSouth has refused to provide a download of the RSAG. (Letter from Cathy Forbes, June 26, 1997, att. 9; Letter from Pam Lee, Aug. 20, 1997, att. 10).

57. BellSouth has justified its failure to provide the RSAG on the basis that the file was too large to provide and that, in any case, the information was proprietary. (Letter from Pam Lee, Aug. 20, 1997, att. 10). But MCI and BellSouth move millions of bytes of data between them -- it is completely implausible that BellSouth cannot transmit the RSAG. As for BellSouth's claim of proprietary information, it has provided no basis to support that claim.

58. Although BellSouth has not agreed to provide the RSAG, BellSouth has agreed to provide the Master Street Address Guide or MSAG. But this is not the Guide used in BellSouth's ordering systems (Stacy I Aff. ¶ 16), and there are no guarantees that the information in this database is identical to the information in the guide BellSouth uses to validate MCI orders. Nonetheless, because BellSouth will not provide downloads of RSAG data and because use of LENS is simply too cumbersome, MCI intends to use the MSAG as the best of a poor set of alternatives. MCI has undertaken a costly and lengthy mapping exercise to ready itself to use the MSAG.

59. MCI also expended resources developing screen scraping as another possible alternative for use in address validation. But, at least for now, MCI has chosen to use MSAG instead, because screen scraping would likely take too long while the customer was on the line. Screen scraping also would not avoid the problems of potential down time of LENS.

**2) CSRs**

60. BellSouth has made a decision not to include all of the information in CSRs in LENS. As a result of BellSouth's business decision, LENS does not provide access to CSRs at parity. LENS only provides CLECs access to a subset of the information available to a BellSouth customer service representative who accesses a CSR. For example, LENS does not provide CLECs with access to a customer's payment history, (Calhoun, Fla. trans., p. 1272, att. 7), information MCI needs in order to determine the size of the deposit a customer must make to

order phone service -- information that MCI should be able to quote the customer over the phone.[8]

61. The list of CSR information to which LENS does not provide access is a long one.[9] BellSouth claims that CLECs do not need the additional information. But CLECs may be able to use this information to design new services BellSouth has not even thought of. It is not for BellSouth to decide that CLECs do not need information to which BellSouth itself has access. One of the major potential benefits of competition is the possibility of innovation in services offered.

62. Not only do CSRs provided in LENS lack important information, the general deficiencies in LENS also make it difficult to access CSRs. BellSouth has not provided MCI the specifications needed to "screen scrape" CSRs into MCI's own systems. When, on July 8, BellSouth finally provided MCI with specifications needed to develop screen scraping, those specifications were for a version of LENS that did not include CSRs. BellSouth has not updated these specifications. As a result, if MCI wishes to obtain access to CSRs, it must use LENS. Because MCI has determined that use of LENS is too cumbersome to use while a customer is on the line (unless absolutely necessary), MCI has decided simply to refrain from use of CSRs at the

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[8]BellSouth says that the South Carolina commission has not required credit history to be available on-line. (Stacy I Aff., ¶41). But the South Carolina commission also has not precluded BellSouth from providing this information. In any case, for the purposes of § 271, it is clearly discriminatory for BellSouth to have access to this information and for it to be unavailable to CLECs.

[9] I have attached a list of CSR information with letters marked next to the items showing N for what BellSouth thought was necessary for CLECs, U for what BellSouth decided was unnecessary, and P for what BellSouth claimed was proprietary. I have also attached a BellSouth letter that includes a BellSouth list of CSR information not provided to CLECs. They are both part of Attachment 11.

pre-ordering stage.[10] What this means is that MCI will not be able to place resale orders for "change as is." A CLEC can only change a customer as is if the CLEC is offering all of the features that the customer is presently receiving from the BOC; thus, the CLEC must check the CSR to see all of the features the customer is presently receiving before placing the order. In the absence of an ability to place a "change as is order," MCI will place orders for "change as specified" -- MCI will ask the customer what features he/she wants and will place those on the order. A "change as specified" order requires input of more codes on MCI's side of the interface and more edits on BellSouth's side of the interface; it thus is more likely to produce errors than a "change as is" order.

**3) Telephone Number Reservation**

63. Another important pre-order function is the ability to reserve a telephone number or multiple numbers for a customer. LENS only allows a customer service representative to reserve a maximum of six telephone numbers for a customer in one LENS session.[11] It is therefore particularly cumbersome to use for big business customers. Although BellSouth implies that only eight to ten new customers in South Carolina a year would need to reserve more than six phone numbers, (Stacy I Aff., ¶ 71), it does not explain how it made this calculation, and it seems extremely unlikely that it is correct given that most business customers have more than six lines.

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[10]MCI still intends to use CSRs to make corrections on orders that are rejected.

[11]The 100 number limit described by William Stacy (Stacy I Aff., ¶ 25) is related to an alternative means of reserving numbers. A CLEC can reserve 100 numbers per switch. This method of reserving phone numbers is even worse than reserving the numbers through LENS. If, for example, a CLEC engages in a mass marketing campaign and quickly goes through the 100 numbers, it will not be able to reserve any new phone numbers for new requests for service until it arranges with BellSouth to replenish the numbers. With all the problems with LENS, it is clearly a better alternative.

It may be that BellSouth's calculation only includes orders for 7 or 8 lines, not 9 lines or more, since orders for nine lines or more are handled manually. (Calhoun, N.Car. trans., pp. 73-74, att. 12; Ga. trans., pp. 3643-44, att. 5). This is an even bigger problem than the limit of reserving six phone numbers.

64. BellSouth also states that CLECs can reserve more than six lines for a customer if they do so "in a slightly different way," but it has not explained what this way is or how it provides service at parity. (Calhoun test., S.Car. trans., p. 65, App. C, Vol. 3, Tab 59).

65. In order to reserve a telephone number through LENS, a CLEC customer service representative must enter the number reservation function and go through the process set forth therein. In contrast, a BellSouth customer service representative using RNS automatically sees an "assigned" telephone number which he/she can offer to the customer; only if the customer does not want this number does the BellSouth representative have to use the number reservation function. (Calhoun, N.Car. trans., p. 60, att. 12). This can be seen, to some extent, by comparing the RNS number reservation screen (Stacy I Aff., ex. WNS-8) where the number (803) 731-8280 has been pre-selected with the LENS number reservation screen (Stacy I Aff., ex. WNS-6) where no number has been pre-selected.

66. In offering customers a choice of numbers, a CLEC has no way of viewing the NXX codes available to the customers; in contrast, a BellSouth representative using RNS can easily view such codes. (Calhoun, Fla. trans., 1283, 1447-48, att. 7; Calhoun, N.Car. trans., p. 59, att. 12). This is also true in BellSouth's business system DOE as can easily be seen by comparing the number reservation screen in DOE, (Stacy I Aff., ex. WNS-9), with the comparable screen in LENS (Stacy I Aff., ex. WNS-6).

67. BellSouth also discriminates against CLECs by limiting the time for which phone numbers can be reserved through LENS to nine days. A BellSouth service representative can start an order and then place it on hold for up to 30 days. (Calhoun, N.Car. trans., p. 14, att. 12). Such functionality is important. For example, there may be a need to keep an order on hold until a customer deposit is received or until a customer makes a final decision about a particular feature. Although a CLEC can place an order on hold in its internal systems before sending it on to BellSouth, if it sends the order to BellSouth more than nine days after reserving a phone number, or if the order takes more than nine days for BellSouth to process, the phone number obtained at the pre-order stage and told to the customer will be gone. (LENS User Guide, att. 13, p. 18). This is not true when BellSouth places an order on hold.

68. Even when BellSouth's pre-ordering systems function successfully to allow a CLEC to reserve a telephone number for a customer, that number reservation is not firm. BellSouth may change the number before it completes the customer's order. As a result, when a customer orders phone service from a CLEC, it cannot begin printing stationery or business cards with the number promised until its order is completed. In contrast, I believe that when BellSouth promises a phone number to its customer that promise is firm . Although BellSouth's OSS expert Gloria Calhoun has testified to the contrary (Calhoun test., S.Car. trans., p. 74, App. C, Vol. 3, Tab 59), when an MCI employee recently ordered service from BellSouth, he was told that the telephone number he was given was firm and that he could print business cards based on that number.

69. Finally, BellSouth's numbering reservation systems do not give CLECs access to "vanity" numbers at parity. Vanity numbers are numbers that spell a word or words, such as

CALLMCI. If a CLEC's customer wishes to reserve a vanity number, the CLEC's customer service representative types that number into LENS to determine whether it is available; if it is not available, the customer can suggest other numbers. But if the customer cannot think of more numbers, the customer service representative cannot access a list of available vanity numbers in order to make suggestions to the customer. This is true even though, at least as of several years ago, MCI was told that BellSouth has such a list. At that time, BellSouth explained that it does not allow its own customer service representatives to access this list. Similarly, in the testimony filed here, William Stacy briefly describes the limited access of BellSouth customer service representatives to vanity numbers. (Stacy I Aff., ¶ 24). But that is a business decision of BellSouth. BellSouth should not be able to force CLECs to do business in the same way it chooses to do business itself. Real parity requires that CLECs have the same list as BellSouth and then each company can decide how to best use the list.

**4) Due Date Assignment**

70. Another important pre-ordering function is due date reservation. This function enables a customer service representative to tell the customer when he can expect his service to be turned up. For BellSouth's own customer service representatives, BellSouth's Direct Order Entry Support Applications Program (DSAP) calculates due dates based on the availability of BellSouth's work force, the type and size of a customer's order and other factors. (Calhoun test., S.Car. trans., pp. 209-10, App. C, Vol. 3, Tab 58). The customer service representative can then quote that due date over the phone to the customer.

71. In contrast, LENS has no method of calculating due dates for unbundled network element (UNE) orders. None of the due date information in LENS applies to UNEs.

72. LENS is better, but not that much better, with respect to resale. In the past, BellSouth has indicated that the same DSAP program used by BellSouth representatives is available for use by CLECs. This is only true, however, if CLECs are using LENS for ordering as well as pre-ordering. As I will explain below, MCI desires to use BellSouth's EDI interface, rather than its LENS interface for ordering, because EDI is the industry standard and is far superior to LENS. Indeed, BellSouth itself has explained that EDI is the recommended ordering interface and that it expects 80% of service orders from new entrants will be received via EDI (Calhoun Test., S.Car. trans., p 58, App. C, Vol. 3, tab 59). As a result, MCI will not have access to DSAP to calculate due dates.[12]

73. Even if MCI did have access to DSAP this would not create parity. When CLECs access DSAP via LENS, DSAP calculates due dates incorrectly for customer conversions that do not require a customer visit (Calhoun, Fla. trans., 1326-30; att. 7 ). Although BellSouth may be cryptically suggesting that this problem was fixed in early September, (Stacy I Aff., ¶ 36), the only correspondence MCI has received from BellSouth states that LENS' calculation of due dates is not reliable. (Letter from J.M. Baker, Sept. 2, 1997, att. 14). MCI has not received any letters

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[12]BellSouth asserts that CLECs can gain access to DSAP even if they do not use LENS for ordering. It claims that CLECs can use LENS in the firm order mode but not actually place an order. But as I described above (note 6) if MCI were to use LENS in the firm order mode, it would have to go through each pre-ordering step and each ordering step even if it only wanted to use some pre-ordering steps -- a process that is too time consuming to be practicable. It would have to go through each step in the ordering process. (Stacy I Aff. ¶ 11). As BellSouth's Gloria Calhoun explained, "there needs to be an associated service order for DSAP to actually calculate a due date." (Calhoun test., S.Car. trans., p. 66, App. C, Vol. 3, Tab 58).

telling it that this problem has now been fixed, nor has there been sufficient time for BellSouth to show that the problem has been fixed.

74. In any case, in reality, MCI (and all of the other CLECs who use EDI for ordering) will only have access to LENS' own due date function for pre-ordering (provided in the inquiry rather than the firm order mode of LENS). In order to use this function, however, a CLEC customer service representative must rely on a cumbersome presentation screen to manually calculate a due date after taking into account several separate pieces of information -- typical installation intervals, normal working days, and days the particular end office may be closed (dates which, despite the exhibit attached to Mr. Stacy's affidavit, are often not presented by LENS in chronological order). (Calhoun, Fla. trans., pp. 1308-12, att. 7; N Car. trans., pp. 71-72, att. 12; Stacy I Aff., ¶ 33, ex. WNS-17). Even if this calculation is performed successfully, there is no promise that the calculation will provide the same date as would be calculated by DSAP. (Calhoun, S.Car. trans, p. 20, App. C, Vol.3, Tab 59). Finally, because there is a gap between a CLEC's use of pre-ordering functions and submission of a CLEC order, by the time the CLEC submits the order -- the dates calculated as available using LENS might no longer be available. As a result, a CLEC cannot reliably quote this date to its customer.

75. In contrast, on the screen presented to a BellSouth customer service representative in RNS, the first available due date is automatically calculated and highlighted in green (Calhoun, N. Car. trans., p. 70, att. 12; Fla. trans., pp. 1314-15, att. 7). In addition, because a BellSouth order flows immediately from pre-ordering to ordering, the due date calculation will not have changed by the time the order is submitted, so the due date can be quoted much more confidently to the customer.

76. Another aspect of BellSouth's discriminatory provision of due dates was gleaned by MCI representatives at a demonstration of BellSouth's OSS in Florida. As they understood in that demonstration, a BellSouth customer service representative has the ability to determine if service was ever established at an address. If service has ever been established, the representative quotes "we can have service to you by this afternoon or tomorrow at the latest." The assumption is that the facilities are in place and service will require nothing more than a translation change in the switch to turn on the phone. New entrants, in contrast, are unable to check whether service has ever been established at the particular address and must therefore assume that customers moving into a residence will require new facilities. As a result, the due date they quote the customer is dependent on when a site visit can be arranged; they cannot quote a due date of "this afternoon or tomorrow at the latest." New entrants therefore will not be able to provide service as quickly as BellSouth.

77. I believe that Mr. Stacy is claiming that this problem will soon be fixed. I think he is referring to this problem when he states that CLECs will soon be able "to view the Quickservice of the Connect-Through indicators" in order to help "determine if a technician needs to be dispatched." (Stacy I Aff., ¶ 48). What is clear, however, is that for now access to this functionality is discriminatory.

**5) Feature Availability**

78. Feature availability enables CLECs to ensure that a feature requested by the customer is available at the end office serving the customer's address. Using LENS, a CLEC must manually scroll through a non-alphabetized list of services, features and functions to

determine which ones are available. (Calhoun, Fla. trans., pp. 1295-96, att. 7; N. Car. trans., pp. 63-65, att. 12). In contrast, a Bellsouth representative using RNS can access information about a particular service or feature simply by typing in the name (or the first few characters of the name) of the desired feature (Calhoun, Fla. trans., p. 1299, att. 7; N.Car. trans., p. 65. att. 12).

79. BellSouth is providing MCI with downloads of feature availability information -- which enables MCI to avoid most of the problems with use of LENS to access feature availability by enabling MCI to make a feature availability function part of MCI's own systems. However, the downloads of feature availability provided by BellSouth are missing some crucial information -- the Universal Service Order Codes (USOCs) by which the particular features are ordered. As I will explain further below, there are thousands of USOC codes. MCI has had to manually type in the codes that BellSouth has provided into its own database. This is inferior to receiving the codes as a download, because the codes may change before a new manual guide is issued and this will cause MCI's orders to reject. In contrast, a BellSouth representative has automated access to the current USOCs. As a result, while downloads of feature availability are superior to use of LENS, the current downloads still do not provide parity.

**6) PIC Availability**

80. LENS's provision of information on the interexchange carriers available to a customer is also discriminatory. If a customer requests a particular interexchange carrier, a CLEC customer service representative must page through a non-alphabetical list of the many interexchange carriers to determine if the requested carrier is available and to determine the ordering code for that carrier. (Calhoun, Fla. trans., pp. 1288-92, att. 7). In contrast, a BellSouth

customer service representative using RNS can simply type the name of the requested carrier and, if that carrier is available to the customer, the ordering code will appear automatically. (Calhoun, Fla. trans., p. 1293, att. 7).

81. However, unlike with most other pre-order functions, MCI, at least, has arranged to avoid the difficulties of using LENS to access PIC information. BellSouth provides MCI with downloads of PIC availability that MCI can integrate into its own systems.

**7) Other Functions**

82. In addition, BellSouth's own pre-ordering information includes two functions that it does not provide to CLECs at all. A CLEC cannot use LENS to access information as to whether a particular address is located within a county or municipality for purposes of determining whether the customer will be subject to local taxes. BellSouth's systems not only provide access to this information, but also use it to automatically populate the order form. (AT&T witness Bradbury, Fla. trans. 2931, att. 15).

83. A BellSouth customer service representative can see which promotions BellSouth is currently offering. But a CLEC customer service representative cannot use LENS to check which promotions are available. (Calhoun test., Ga. trans., p. 3477, att. 5; Stacy I Aff., ¶ 30). This is so even though MCI, at least, has a contractual right to resell promotions in many circumstances. (MCImetro/BellSouth Interconnection Agreement, Attachment II, § 2.3.6).

84. There are three pre-order functions being addressed by the OBF to which BellSouth provides no access at all. These are: (1) block of direct inward dial (DID) numbers inquiry; (2) DID trunk inquiry; and (3) unbundled network element service provider inquiry.

These missing functionalities are important. The last one, for example, is essential in an environment in which multiple service providers might be providing different pieces of a single customer's service -- where, say, carrier A furnishes the loop, carrier B furnishes the switching capability, and carrier C furnishes directory assistance services. By overlooking this functionality, BellSouth's pre-order OSS fails to present all information that a CLEC requires at the pre-ordering stage in order to convert an existing customer's services through an unbundling situation involving another CLEC. Thus, only BellSouth has visibility into the existing unbundled network architecture for a customer that converts between CLECs. This is discriminatory.

**8) LENS Is Not Yet Fully Operational**

85. LENS is not yet fully operational. LENS was first made available for use by CLECs on April 28, 1997. (Calhoun, S.Car. trans, p. 51, App. C, Vol. 3, Tab 59). Only at that point did BellSouth begin discussing LENS with CLECs to determine whether it met their needs. (Stacy, S.Car. trans., p. 79, App. C, Vol. 4, Tab 60). As CLECs have begun using LENS, they have explained to BellSouth what missing functionality they have discovered as well as other problems they have encountered. CLECs continue to discover problems and make suggestions to BellSouth. As a result, BellSouth has been making changes to LENS. Only in mid-June, for example, did the address validation function provide the addresses needed to submit an order through EDI and only then did it first provide CSRs. (Calhoun, S.Car. trans, p. 274, 52-53, App. C, Vol. 3, Tabs 58, 59). As of early July, the date of the South Carolina hearing, Gloria Calhoun of BellSouth testified that numerous changes were expected in LENS for the next six to nine months. (Calhoun, S.Car. trans, p. 54, App. C, Vol. 3, Tab 59). And in testimony for Florida,

William Stacy conceded that LENS has been undergoing almost weekly updates (Stacy Deposition, Fla. ex. 52, pp. 128-30, att. 16) and that a number of significant fixes remain to be made. (Stacy, Fla. ex. 53, att.17 (listing and prioritizing future changes)).

86. MCI customers service representatives using LENS continue to be kicked out of LENS on a frequent basis. On October 3, for example, three MCI customer service representatives in Atlanta were using LENS. The daily productivity of the first representative reads as follows: "9:32 LENS server down[;] 9:46 LENS error Exception [;] 9:58 LENS error Exception[;] 10:16 Server Error[;] 10:58 Server Error[;] 2:20 LENS Error[;] 2:51 (3:00) Lens Error/LENS Down." The report of the second representative reads: "LENS Errors 9:58 a.m. 10:15, 10:50, 2:20[;] LENS went Down @ 3:00 p.m. . . . ." The report of the third representative reads: "Server down numerous times[;] LENS down @ 3:00 pm . . . ." (Att. 18). This is hardly a system that is reliable enough to use while customers are on the line.

87. The capacity of LENS is still entirely unknown. Although BellSouth claims that it designed LENS to support three pre-order functions per order for an expected 5,000 orders a day, BellSouth admits that it is still working to identify the capacity of LENS. (Calhoun test., S.Car. trans., pp. 66-70, App. C, Vol. 3, Tab 58). In the state proceeding, BellSouth submitted no test evidence of the capacity of LENS. (Calhoun test., S.Car. trans. p. 70, App. C, Vol. 3, Tab 58). Nor does it appear that BellSouth has submitted such evidence here, though it is, of course, possible that I missed it among the thousands of pages of exhibits. Even if LENS can function at the capacity at which it was designed, this capacity is not very high given that it is for the entire BellSouth region.

**B) BellSouth's Ordering/Provisioning Processes Remain Fundamentally Deficient**

88. After a CLEC's service representative has determined what phone service is desired by a new customer -- and has determined that service will be provided by some combination of resale or unbundled network elements -- the representative must transmit the order to BellSouth. BellSouth offers several interfaces for ordering, including EDI. MCI fully supports BellSouth's planned use of EDI; EDI is the approved industry solution and should be used by all ILECs.[13] BellSouth also offers LENS as an alternative for some ordering functions, but does not rely on it to support its claim that it is providing non-discriminatory access to ordering functions. (Stacy I Aff., ¶ 46, 56).

89. In conjunction with the ordering process, the provisioning process provides the means by which the ILEC reports on the status of orders to the CLECs. There are four provisioning sub-functions, i.e., four types of reports the provisioning ILEC must communicate to the requesting CLEC: (i) firm order confirmation; (ii) error notification; (iii) change in order status ("jeopardy notification"), and (iv) order completion. The OBF has already recognized EDI as the correct format for firm order confirmation; it is likely to soon recognize EDI as the correct format for the three other provisioning functions as well. BellSouth offers EDI as an automated option for some provisioning functions but offers manual processes for others. MCI believes that BellSouth should use EDI for all provisioning functions.

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[13]There are a few exceptions to the industry's general commitment to EDI, such as the ordering of local interconnection trunks where the industry plans to use a version of the process developed for ordering trunks in the access arena. BellSouth offers its EXACT process for ordering such trunks. (Stacy I Aff. ¶55).

90. BellSouth's mere promise to provide an EDI ordering and (partial) provisioning interface is insufficient to satisfy the checklist requirement for entry into long distance. My explanation as to why this is has several parts: 1) I will first explain the status of the development of an EDI interface between MCI and BellSouth, why the evidence presented by BellSouth is inadequate to demonstrate the operational readiness of EDI, and how MCI's EDI testing shows that EDI is not yet operationally ready; 2) I will then explain how the high level of manual intervention in orders placed with BellSouth shows that BellSouth's ordering systems are not yet operationally ready; 3) I will then discuss how MCI's trial orders, although not placed through EDI, nonetheless show that BellSouth's ordering and provisioning processes are not operationally ready; 4) I will then turn to a vital discussion -- how functional deficiencies in BellSouth's current processes have become apparent in the course of MCI's testing and development of EDI; 5) finally, I will discuss how BellSouth's use of proprietary USOC codes precludes BellSouth from demonstrating that its ordering processes are non-discriminatory.

### 1) BellSouth Has Not Shown That It Is Offering Operational EDI

#### a) MCI's Development of EDI With BellSouth

91. BellSouth first claimed that its EDI interface was available in December of 1996. (Stacy I Aff., ex. WNS-35). But development of a working EDI interface between BellSouth and a CLEC requires lengthy collaboration under the best of circumstances. Here, BellSouth has significantly delayed the establishment of an EDI interface with MCI.

92. Relatively soon after BellSouth claimed that its side of the EDI interface was ready, in April of 1997, MCI began working with BellSouth to establish an EDI connection. At

that time, BellSouth presented MCI with the specifications for its current version of EDI. This version is a hybrid of two versions of the industry standard (EDI 6.0 and EDI 7.0) combined with some BellSouth proprietary additions.

93. MCI began reviewing these specifications and developing test scenarios based on them. However, in a meeting on April 22, BellSouth told MCI that it had released new specifications on April 1 and that the ones it had provided to MCI were no longer valid. BellSouth sent MCI these new specifications on May 5 and May 7.

94. Since MCI received the EDI specifications in May, MCI and BellSouth have had a series of discussions concerning the implementation of EDI, with MCI posing questions the answers to which are needed for MCI to complete the mapping of its side of the EDI interface. The process of mutual EDI development is inherently somewhat lengthy. Here, that process has been made lengthier than necessary as a result of deficiencies in BellSouth's documentation and ever-changing positions by BellSouth. Also, BellSouth's documentation generally does not contain any examples (which is contrary to standard practice because it makes it much harder to develop the interface). As a result, MCI has had to create examples of hunting and directory assistance orders, for instance, and send them to BellSouth for confirmation as to BellSouth's intent. This is a time consuming process.

95. BellSouth's ever-changing stories on what it supports through EDI have also delayed development. For example, BellSouth initially stated that it would support "loss" notification (described below) via EDI but would only support jeopardy and reject transactions manually. Weeks later BellSouth stated that it had been incorrect -- loss notifications would be sent via Network Data Mover, magnetic tape, or paper rather than via EDI (letter from Cliff

Bowers, Aug. 28, 1997, att. 19), rejects would be manual as stated originally, but jeopardies would be sent via EDI instead of manually (e-mail from Judy Rueblinger, Aug. 18, 1997, att. 20). Finally, BellSouth changed its position again and stated that loss notifications would be sent via the United States mail (not via Network Data Mover or magnetic tape) (letter from Cliff Bowers, Aug. 29, 1997, att. 21; e-mail from Judy Rueblinger, Aug. 29, 1997, att. 22; e-mail from Judy Rueblineter, Sept. 4, 1997, att. 23), only some jeopardies (not all) would be supported via EDI, others would be sent manually (e-mail from Judy Rueblinger, Aug. 29, 1997, att. 22), and rejects would be sent manually via fax (e-mail from Judy Rueblinger, Aug. 29, 1997, att 22; letter from Cliff Bowers, Aug. 29, 1997. att. 21). Of course, it was impossible for MCI to complete EDI development until it understood which transactions the EDI interface would support.

96. MCI also requested that BellSouth send it sample transactions on disk so that MCI could validate its coding prior to beginning testing. BellSouth denied the request -- adding to the cost and time needed to complete testing. (Letter from Bryan Green, Aug. 28, 1997, att. 24).

97. It was only the week of September 8th that MCI had sufficient information to complete mapping of the EDI interface. In that same week, MCI established connectivity across the EDI interface and began testing. MCI has adopted a compressed testing schedule, involving 49 test scenarios that MCI hoped to complete by November 1. This testing is designed to check the formatting of the EDI orders and the business rules. MCI intended that after November 1 it would begin sending real orders across EDI and begin determining whether BellSouth's EDI is properly integrated with its fulfillment, billing, and maintenance and repair processes. As I will describe below, however, major problems with BellSouth's interface have arisen that will significantly push back completion of the testing.

98. BellSouth is therefore only at the very beginning of the testing and commercial operation needed to show the operational readiness of EDI. As discussed below, this is true not only of BellSouth's tests with MCI but also of its tests with other CLECs.

**b) BellSouth Has Not Shown the Operational Readiness of EDI**

99. BellSouth's ordering processes are not operationally ready. First, what is most important is the operational readiness of BellSouth's EDI interface. As BellSouth readily acknowledges, LENS is not the ordering interface that is preferable, nor is it the interface that BellSouth is relying on to prove that it provides non-discriminatory access to ordering (Stacy I Aff., ¶¶ 46, 56; Calhoun test., Ga. trans., p. 3448, 3492, att. 5). LENS is a non-standard process. LENS is only capable of being used to order eight of 114 families of services provided by BellSouth and is only capable of ordering six lines or fewer at a time (Calhoun test., Ga. trans. pp. 3467-68, 3565, att. 5). LENS is only capable of handling unbundled elements through comments by CLECs in the remarks section, (Calhoun test., S. Car. trans., p. 27, 70-71, App. C, Vol. 3, Tab 59), and processing these orders requires manual intervention on BellSouth's side of the interface (Calhoun test., S.Car. trans., p. 253, 22-23, App. C, Vol. 3, Tabs 58-59) . LENS cannot be used to change, modify, or add new features to existing service. (Calhoun test., Ga. trans., p. 3476, att. 5). And, even with respect to the limited functionality that it does ostensibly offer, LENS is far from ready. As I will discuss below, MCI's experience placing test orders through LENS shows that it is not currently adequate.

100. As for EDI, BellSouth simply does not yet have the needed experience to show the operational readiness of EDI. At the South Carolina hearing, BellSouth acknowledged that

AT&T was the only CLEC that has completed EDI service readiness testing and that no CLEC has placed a commercial order using EDI in South Carolina (Stacy test., p. 69, App. C, Vol. 4, Tab 60). BellSouth does not significantly alter these claims here. Although BellSouth now claims that some CLECs have submitted orders through EDI, (Stacy I Aff. ¶ 110), the only data it presents shows that 6,715 EDI orders were submitted in August, (Stacy I Aff., ex. WNS-38) -- one months worth of relatively limited usage -- and BellSouth fails to present any data showing that the commercial usage has been successful. BellSouth acknowledges that no orders for unbundled elements have yet been placed via EDI (Stacy I Aff. ¶ 58). This is not for lack of effort on the part of the CLECs. As I explained above, MCI has been diligently working with BellSouth to develop an EDI interface since shortly after BellSouth claimed to be ready to provide EDI.

101. BellSouth has not even presented any data showing successful testing of its EDI interface with any CLEC. As for the test with AT&T, the only results BellSouth provided to AT&T described whether AT&T had sent correctly formatted orders. (Stacy, S. Car. trans., pp. 87-88, App. C, Vol. 4, Tab 60). The results did not show anything about whether the orders were processed correctly, or how long they took to process, or how long any of the provisioning processes took, or whether the processing was automated. (Stacy, S.Car. trans., pp. 87-88, App. C., Vol. 4, Tab 60). In part, this was because there was not yet any agreement on how to measure performance. (Stacy, S.Car. trans., p. 88, App. C, Vol. 4, Tab 60). Even the limited data BellSouth provided to AT&T was not provided to the South Carolina Commission.

102. The deficiencies in the data BellSouth presented to the South Carolina Commission regarding the readiness of EDI have not been corrected here. While BellSouth provides some general data related to its ordering performance, **none** of this data is specific to

orders placed via EDI -- the only interface BellSouth claims to rely on to prove the readiness of its ordering systems. Mr. Stacy asserts that its tests with AT&T have been successful, (Stacy I Aff. ¶ 124), but, as was true at the state level, BellSouth provides absolutely no data to support this claim. (The general data provided by BellSouth includes orders placed via LENS and manual processes as well as EDI, so it is not usable to accurately assess the readiness of EDI). Nor does Mr. Stacy even explain what these tests consisted of -- whether they, for example, included orders of any type other than resold Plain Old Telephone Service (POTS).

103. In lieu of data based on commercial experience or even testing with CLECs, BellSouth has submitted some internal test results to show the readiness and capacity of EDI. But, as this Commission has recognized, (Ameritech MI Order, ¶ 138) and as I have explained above, internal testing is generally inadequate to demonstrate the readiness of an interface. Here, BellSouth's internal testing is particularly suspect, since BellSouth makes very little effort to explain the nature of its internal tests which makes it quite difficult to ascertain the validity of the results. First, BellSouth fails to explain the methodology it used in its testing -- for example, the mix of test orders submitted to its systems (did the test orders include unbundled element orders as well as resale; suspensions and disconnects as well as migrations?). Second, BellSouth also fails to explain the results it did obtain -- for example, its Encore Volume Test p. 1 (Stacy I Aff., ex. WNS-45) states that 2000 LSRs were submitted through EDI and 946 FOCs and 855 completions were returned; BellSouth fails to explain what these numbers mean and why they are acceptable. Third, BellSouth fails to provide some important test data, and, indeed, BellSouth may not even have tested to obtain this data. BellSouth fails to present data showing, for example, which, if any, orders dropped out of its systems for manual processing, and what

percentage of test orders were provisioned correctly without erroneous deletion or addition of features. Finally, as I will discuss below, BellSouth has not completed the internal testing that it has undertaken.

104. In addition to failing to show the readiness of its EDI interface to successfully process orders, BellSouth's internal tests fail to show that the capacity of that interface is adequate. In the state proceeding, BellSouth submitted no test evidence of the capacity of EDI. Gloria Calhoun testified that EDI has a maximum capacity of 8,000 orders a day; that LEO -- the first back-end system through which orders must flow -- has been tested to a capacity of 5,000 orders a day, and that LESOG -- the second back-end system through which orders must flow -- has a capacity of 5,000 orders a day with a spare capacity of another 5,000 orders a day (Calhoun test., S.Car. trans., pp. 1233-34, 27, App. C, Vol. 3, Tabs 58, 59; Calhoun test., Ga. trans, p. 3401, att. 5 ) (ordering capacity of EDI plus LENS is 5,000 orders a day)). Here, Mr. Stacy testifies to similar numbers -- except that the capacity of EDI is expressed as 4,000 orders per day instead of 8,000, and that Mr. Stacy now asserts that the capacity magically can be increased fourfold within a week. (Stacy I Aff., ¶ 121; ex. WNS-43). Mr. Stacy also presents some test results of capacity, though it is not clear how the results are related to the capacity numbers he claims. For example, an extrapolation from the numbers of p. 1 of exhibit WNS-45 suggests a capacity less than Mr. Stacy has stated, but an extrapolation from the numbers on p. 2 suggests a capacity greater than Mr. Stacy has stated. As a result, I am highly dubious of Mr. Stacy's assertions regarding capacity. And one must accept all of Mr. Stacy's claims, including the ability to quickly increase capacity fourfold, to arrive at a capacity of 16,000 orders a day for an eight state region.

105. In any case, the internal tests on which BellSouth places so much reliance to show operational readiness and capacity have not even been completed. BellSouth explains that many of its internal tests were designed with the help of IBM and that IBM will return " when stress testing is completed" to review the results; the review is expected by November. (Stacy I Aff. ¶ 118). Of course, a review expected two months from now cannot show the readiness of systems today.

**c) MCI's Tests Show BellSouth's EDI Is Not Operationally Ready**

106. In addition to the deficiencies of BellSouth's internal testing, the results are already being disproven by early stages of MCI's EDI tests with BellSouth. Early testing has revealed substantial problems with BellSouth's EDI interface that are causing MCI test scenarios to be rejected even though MCI had correctly mapped to BellSouth's implementation guide.

107. BellSouth's EDI interface fails to accept correctly mapped feature details (FIDs). Most features that are ordered have specific details that must be provided with them. For example, on an order for voice mail, a call forwarding number must be provided, as well as the number of rings a customer desires before transferring the call to voice mail, as well as whether the customer wants calls transferred to a pager number. The CLEC provides these details through FIDs entered on the order. BellSouth's Local Exchange Ordering Guide states that each FID should be placed on a separate line in a separate data segment. An example from the LEO Guide is attached as att. 25. This is also the industry standard. MCI mapped to this format for entry of FIDs. Examples of MCI's mapping which were approved by BellSouth are attached as. att. 26. However, MCI's test scenarios containing multiple FIDs have been rejected. BellSouth then stated that their systems can not process multiple FID segments, and that all of the FIDs

must be entered on a single line without spaces between them. MCI would have to remap its EDI interface in order to enter FIDs in this manner, and there is no guarantee that this re-mapping would then work. MCI asked for BellSouth to provide an example of the correct way to format the data, but on October 13, BellSouth stated that they would not provide one. MCI has asked again and is waiting for a response.

108. BellSouth's EDI interface does not properly handle additional listings. Customers often require more than one directory listing (e.g. a husband and wife want separate listings). Under the industry standard format, the multiple listings would be provided in different "PO1" data segments. BellSouth's documentation shows that they should be provided in a single segment. (Att. 27). When MCI asked BellSouth in early meetings if it could provide the information in multiple segments, BellSouth said this was acceptable. Nonetheless, MCI's test scenarios that included multiple listings were rejected. On September 23, BellSouth told MCI that it had to place the multiple listings in a single PO1 segment. MCI then spent a week re-mapping based on the example in BellSouth's Local Exchange Ordering Guide. This delayed MCI's testing. MCI then sent a re-mapped test scenario and it again rejected. Amazingly, on October 13, BellSouth then stated that the multiple listings should be sent in multiple PO1 segments as MCI had first done. This would require several more days of work by MCI, work MCI is unwilling to undertake when it has no reason to believe that it will result in proper processing of the orders. MCI is still waiting for BellSouth to align its systems to what it has set forth in its LEO Guide.

109. Every order must contain the customer's address. The industry standard provides for the entry of many different types of addresses -- an apartment, a boat slip, a pier, a suite, a lot,

a conference room and so on. But BellSouth's EDI documentation requires address to be formatted by building, floor, or room. (Att. 28). It does not contain any other options. Nor does it explain how to fit the other options into the BellSouth categories. MCI assumed that an apartment number should go under room. But this caused MCI's order to reject. BellSouth then provided an explanation of how to format addresses for some of the possible locations. (Att. 29) MCI has not received information for all types of locations. MCI has had to remap its EDI interface based on BellSouth's information. Some of this has been done. For other locations, MCI is determining how much work would be required.

110. Each order must contain information on whether a customer is exempt from federal, state, county, or municipal taxes. BellSouth's LEO guide calls for a CLEC to enter a "TX" code if an individual is exempt from all taxes. (Att. 30). It has turned out that BellSouth's systems do not recognize a TX code and that orders sent with that code have errored out. (Att. 31). BellSouth initially told MCI that it would fix this problem by October 15. Recently, however, BellSouth told MCI that it would not fix the problem until it came out with EDI 7.0. MCI has worked around this problem by entering the tax exempt information in a different way.

111. Because of these multiple problems, six of the first eight test scenarios MCI has sent have been rejected. Not only has this delayed MCI's testing while MCI worked around some of these problems, but it will preclude much additional testing. All but one of the additional 41 scenarios that MCI had planned to test contains either multiple FIDs and/or multiple directory listings. As a result, submitting these test scenarios would only result in rejected orders.